

MONTEREY COUNTY



Emergency Communications Department

9-1-1 FIRE, POLICE, MEDICAL

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December 20, 2011

Request for FCC Narrowbanding Deadline Waiver

Federal Communications Commission
Public Safety and Homeland Security Bureau
445 12th St., S.W.
Washington, D.C. 20554

The County of Monterey, California on its behalf and for all local agencies participating in the Next Generation (NGEN) radio system, hereby requests a six-month extension to comply with narrowband mandate for VHF and UHF Part 90 frequencies. This letter contains the justification for our request as required under Section 1.925 and the Commission's *Public Notice*, DA 11-1189 (released July 13, 2011).

Members of the NGEN radio system include the County of Monterey, Cities of Carmel-by-the-Sea, Del Rey Oaks, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Seaside, Sand City and Soledad, Monterey County Regional Fire Protection District, North Monterey County Fire Protection District, Spreckels Volunteer Fire Company and Big Sur Volunteer Fire Brigade. Governance of the NGEN radio system is facilitated through the Emergency Communications Users Advisory Council (ECUAC).

Background

The members of the NGEN radio system currently operate a number of separate conventional VHF and UHF radio channels. Frequencies that are currently used in the County and included with this request are listed on Table 1. Member agencies have known about the FCC narrowband mandate for many years and have taken progressive steps in preparation.

In April 2006, a "Monterey County Operational Area Emergency Communications System Strategic Plan" was completed and presented to the Monterey County Board of Supervisors. The plan recommended regionalization of all local public safety radio systems. Local agencies formed an NGEN Task Force as a subcommittee to the ECUAC, an existing governing body of the regionalized Public Safety Answering Point (PSAP) and dispatch center.

As the next phase of the strategic plan, a Request for Proposal (RFP) #9997 was issued seeking consultants to develop a functional design, study of requirements for a new regional system, and provide assistance with drafting of an RFP for the design / build of a next generation radio system. After a detailed evaluation process of that RFP, the NGEN Task Force recommended accepting the bid of DELTAWRX as the lowest, most-responsive bidder for the RFP Consulting Services from the four responses received. That Agreement was approved by the Board of Supervisors on May 22, 2007.

Throughout 2007 and 2008, the NGEN system requirements were developed based on user needs for a regional system. The economic downturn in 2008 caused significant disruption to the project and called into question the overall financial viability of a regional system and commitment of member agencies. On May

12, 2009 a “Memorandum of Agreement re Next Generation Radio System Joint Governance and Financing” (the “NGEN Financing Agreement”) was executed. This agreement included a commitment from all of the member agencies to fund a regional radio system.

On June 1, 2009, The County released RFP #10122 soliciting turnkey proposals for the design and implementation of the NGEN radio system. Several proposals were received and evaluated. The selection team conducted an extensive evaluation process, which included site visits, oral presentations and a best and final offer solicitation. On December 7, 2010 the County Board of Supervisors approved the negotiated contract for the NGEN Regional radio system with an award to Harris Corporation.

The NGEN shared infrastructure is funded directly by member agencies with support from federal grants including the U.S. Department of Justice Community Oriented Policing (COPS) Technology Grant Program and the Assistance for Firefighters Grant (AFG) Program.

Current Status

Many of the current base stations used by NGEN member agencies are narrowband capable. Some agencies have also replaced their fleet of portable and mobile radios; however, there remain many agencies that have a significant number of radios that are not narrowband capable. As such, we currently have the ability to narrowband some frequencies, but do not plan to retune existing channels until a cutover plan is complete that will ensure interoperability is sustained throughout migration to the new regional system.

2011 has been spent completing the system design and acquiring approval to use radio sites. The NGEN system, as currently designed, will have a P25 VHF trunked subsystem, a P25 700 MHz trunked subsystem and analog VHF conventional paging and overlay subsystem. The system will initially handle approximately 3,500 user radios. At the time of this request the radio equipment and funding is available to complete the NGEN system. However, two of the essential radio sites are experiencing extended regulatory review processes including compliance with the California Environmental Quality Act (CEQA) and National Historic Preservation Act (NHPA).

While our goal continues to be completion and cutover of the NGEN system before January 1, 2013, our latest approved project schedule has system cutover beginning in late February 2013 and a final acceptance date of May 27, 2013. It is also reasonable for us to expect project delays that will push the cutover date further into 2013. While regulatory issues are currently holding up our critical path, we are also concerned about the timeline available for adequate cutover, testing and training to ensure that the new system is successful. The new system will reuse a number of existing frequencies, which necessitates a phased approach to cutover, likely requiring multiple reprograms of the entire fleet. The project team desires adequate time for testing and optimization of the system, especially given our approach of a multi-band (VHF / 700 MHz) infrastructure. We hope not to be forced into use of the system before we are sure that it will function properly.

Interference

There is a significant amount of interference on the current channels, particularly in the crowded VHF spectrum. Local agencies have steadily experienced increased interference and decreased coverage over the decades since most of the channels were first installed. Relief from this interference is one of the goals of the NGEN system. Once implemented, NGEN will allow use of frequencies with significantly less co-channel and adjacent channel interference. Through the “give-back” process we will also likely relinquish many of the frequencies that interfere most with neighboring agencies. The amount of spectrum that can be relinquished is not yet known and will be further evaluated once our FCC license applications for the NGEN system have been approved.

In summary, the County of Monterey, on its behalf and for all local agencies participating in the Next Generation (NGEN) radio system, requests a six-month extension to July 1, 2013 to comply with the narrowband mandate for the VHF and UHF licenses and frequencies listed on Table 1.

Thank you for your support of public safety and consideration of our request.

Sincerely

A handwritten signature in blue ink, appearing to read "Lynn Diebold", written over a horizontal line.

Lynn Diebold
Director of Emergency Communications

A handwritten signature in blue ink, appearing to read "David C. Dalby", written over a horizontal line.

David C. Dalby, P.Eng. NSPE
Assistant Director of Information Technology as primary FCC license administrator for licenses included in this application.

Table 1: Licenses Requesting Extension

Licensee	FRN	Call Sign	Frequency (MHz)
Monterey, County of	0004120390	KA5117	154.725
			154.785
			154.815
			155.190
			155.490
			155.535
			155.595
			155.730
			155.910
			155.970
			156.015
			158.805
			158.850
			158.910
			159.090
			159.180
			159.210
Monterey, County of	0004120390	KAQ361	155.730 159.090
		KDK98	
		KHQ52	
		KJN825	
		KKO50	
		KMA600	
		KMH974	
		KNIS913	
		WAG42	
		WHL62	
		WNUA302	
		WQNJ481	
		WQNJ482	
		WQNJ484	
		WQNL864	
		WQNL866	
Monterey, County of	0004120390	KMA393	155.730
			159.090
			453.5875
			458.5875
Monterey, County of	0004120390	KMA809	155.595
			155.670
			155.730
			158.850
			159.090
Monterey, County of	0004120390	KNIS912	155.730
Monterey, County of	0004120390	WBF95	155.595
			155.730
			158.910
			159.090

Licensee	FRN	Call Sign	Frequency (MHz)
Monterey, County of	0004120390	WNKV646	154.725
			154.785
			154.815
			155.595
			155.730
			158.910
			159.090
King, City of	0004514824	WBM79	154.755
			155.730
			156.015
			158.805
			159.090
Monterey, County of	0004120390	WNCH891	452.225
			457.225
Monterey, County of	0004120390	KIJ495	155.595
		WCM521	158.910
		WGP788	
Monterey, County of	0004120390	WGC325	154.725
			154.785
			154.815
			155.595
Monterey, County of	0004120390	KIB393	155.190
			155.970
			159.210
Monterey, County of	0004120390	WQBB989	153.965
			155.085
Monterey, County of - DRO	0004513792	WNMC399	153.965
Monterey, County of	0004120390	WPGT646	453.750
			458.750
Monterey, County of	0004120390	KVP571	155.535
Monterey, County of	0004120390	KVP572	155.490
		KVR941	155.535
Monterey, City of	0001541234	WSZ35	154.785
		WSZ29	154.815
		WSZ31	
Monterey, City of	0001541234	WPBS270	154.860
Monterey, City of	0001541234	WPJZ458	155.160
			155.235
			155.280
Monterey, City of	0001541234	WPWY867	453.2750
			453.4500
			453.4750
			458.2750
			458.4500
			458.4750
Monterey, County of	0004120390	WAH323	154.725
			154.785
			154.815

FCC – Public Safety and Homeland Security Bureau
 County of Monterey, CA Request for FCC Narrowbanding Deadline Waiver
 December 21, 2011 – Page 6 of 9

Licensee	FRN	Call Sign	Frequency (MHz)
Monterey, County of	0004513735	WSZ34	154.785 154.815
Monterey, County of - DRO	0004513792	WSZ32	154.785 154.815
Pacific Grove, City of	0004514766	WSZ33	154.785 154.815
Monterey, County of	0004120390	WRA487	155.490
Monterey, County of	0004513735	KEC559	155.685
Monterey, County of	0004120390	WQND440	154.025 155.775
Marina, City of	0004518023	WPWX347	155.775 158.835
Marina, City of	0004518023	WZT829	153.785
Monterey, County of	0004120390	KN2803	156.015
Monterey, County of	0004120390	KRJ837	154.755 156.015 158.805 453.6375 458.6375
Monterey, County of	0004120390	WPYH272	154.755 156.015 158.805
Soledad, City of	0004514576	WQG805	154.755 155.805 156.015
King, City of	0004514824	KDZ478	155.100 156.015 158.805
Gonzales, City of	0004514865	WBM78	154.755 156.015 158.805
Monterey, County of	0004120390	WNPO492	153.920 155.805
Monterey, County of	0004120390	KNJE473	460.1750
Monterey, County of	0004120390	WPIH733	460.1750 460.3000 460.3500 460.3750 460.5000 465.1750
Monterey, County of	0004120390	KCT69 KF2934	155.835
Monterey, County of	0004120390	KBJ220	153.815
City of Carmel-by-the- Sea Police Department	0001541945	KMA766	154.710 155.430
City of Carmel-by-the- Sea Police Department	0001541945	KJN869	154.025
Monterey, County of	0004120390	WCT336	453.6750 458.6750

Licensee	FRN	Call Sign	Frequency (MHz)
Monterey, County of	0004120390	KCI996 KNEY537 WNHG584	154.175 154.370
Monterey, County of	0004120390	KQR351	154.175 154.370 156.105
Monterey, County of	0004120390	WQGS653 WQNK516 WQNK517 WQNL863 WQNL867	154.370 156.105
Monterey, County of	0004120390	KDZ443	154.175 154.205 154.370 156.105
Monterey, County of	0004120390	KE3779	153.890 154.175 154.205 154.235 154.370 154.430 154.995 156.105 156.240
Monterey, County of	0004120390	KML267 WNLC257 WQJZ626	154.370
Carmel Valley Fire Protection District	0004513818	KMJ275	154.175 154.370 156.195
Monterey Regional Fire	0004514212	KJD923	154.370 156.105
Salinas Rural Fire Protection District	0004514212	KNGE591 KNIK410	154.370 156.105
Soledad, City of	0004514576	KWV456	154.370 156.105
Gonzales, City of	0004514865	KWE532	154.370 156.105
Monterey, County of	0004513735	KMA696	154.175 154.235 154.370
Monterey, County of	0004514683	KL3141	154.175 154.205 154.370
Monterey, County of	0004514683	KLG552 KNBR747	154.205 154.370 154.995

FCC – Public Safety and Homeland Security Bureau
 County of Monterey, CA Request for FCC Narrowbanding Deadline Waiver
 December 21, 2011 – Page 8 of 9

Licensee	FRN	Call Sign	Frequency (MHz)
Monterey, County of	0004514683	WRE365	154.175
			154.205
			154.370
			154.995
Pacific Grove, City of	0004514766	KMM520	154.175 154.370
Pacific Grove, City of	0004514766	KET302	155.100
King, City of	0004514824	KNBF423	154.370
Marina, City of	0004518023	KCT203	154.175
			154.370
Spreckels Volunteer Fire Company	0004537288	KNEC873	154.370
Monterey, County of	0004120390	WPRJ595	153.890
			154.205
			155.205
			155.325
			155.895
			158.895
Monterey, County of	0004120390	KNIK580	153.890
Monterey, County of	0004120390	KEC844	154.175
Monterey, County of	0004120390	KNIK576	154.175
Monterey, County of	0004120390	WPAU487	154.175
			156.240
Monterey, County of	0004120390	WPMK447	153.785
			155.580
			156.000
			158.775
Monterey, County of	0004120390	WPRH533	156.160
			154.100
			155.955
			156.000
Monterey, County of	0004120390	KJ3939	153.860
			155.865
			158.745
Monterey, County of	0004120390	KLU418	155.205
			155.325
Monterey, County of	0004120390	KQU301	155.325
Monterey, County of	0004120390	KFX278	155.865 158.745
		KJZ979	
		KTO75	
		WAG41	
		WCG530	
		WNHI627	
Monterey, County of	0004120390	KLU411	151.160
			151.340
			154.085
			155.955
Monterey, County of	0004120390	KGR280	151.160
		KGR281	
		KGR283	

FCC – Public Safety and Homeland Security Bureau
 County of Monterey, CA Request for FCC Narrowbanding Deadline Waiver
 December 21, 2011 – Page 9 of 9

Licensee	FRN	Call Sign	Frequency (MHz)
Monterey, County of	0004120390	KJ7114	151.160 151.340
Monterey, County of	0004120390	KNDJ454	151.160 453.000 458.000
Monterey, County of	0004120390	KD9322	150.995 156.060 156.195
Monterey, County of	0004120390	KEQ78 KMZ69 KND41 KNHW909 KXZ61 WAU778 WNFD393 WNFD394 WSY83	156.060
Monterey, County of	0004120390	KMK328 KMK329 KMK330	150.995
Monterey, County of	0004514683	KCI552 KLG554 KNBU647 WRE532	154.040
Monterey, County of	0004514683	WNUS414	156.165
Monterey, County of	0004120390	KMK354	158.880
Monterey, City of	0001541234	WPPB873	158.880
Monterey, County of	0004513735	KCP542	158.940
Greenfield, City of	0010985125	WRE271	155.895